<u>REMARKS</u>

Reconsideration of the application is requested.

Claims 1, 3-6, 10-12, 15, 19-21, 25-27, 30, 34-36, 40-42, 45, 47-49, and 51-53 were rejected in the Office Action. Claims 1, 11, 15, 30, 41, 45, 47, and 51 have been amended, and claims 10, 25-27, and 40 have been cancelled. Accordingly, claims 1, 3-6, 11, 12, 15, 19-21, 30, 34-36, 41, 42, 45, 47-49, and 51-53 remain pending.

<u>Amendments</u>

Support for the amendments to claims 1, 11, 15, 30, 41, 45, 47, and 51 may be found, for example, on pages 12-16 of the originally-filed Specification. There, each display state variable, such as "S" or "T" represents a display state dimension (such as "betting" in the case of "T" – see pg. 13, lines 22-26). The display state variables are each set to correspond to one of a number of display state values (such as 1, 2, 3, etc.), which are then used by the client device to determine the display state. As can be seen on pages 14-15, there are multiple display state definitions sharing a common display state variable: "S". These display state definitions each have a different one of a number of discrete nonequal values (1, 2, 3, etc.) of that common variable.

<u>Interview</u>

In a telephonic interview between the Examiner and Applicant's attorney, held on October 1, 2007, Applicant's attorney explained the similarities and differences between Cook and the invention as claimed in claim 1, the discussion centering around the lack of any sort of "display state dimension" in Cook. The Examiner noted that Cook did not appear to disclose a display state dimension, as Applicant's attorney described the term, but did not think Applicant's attorney's description of the display state dimension was fully brought out in claim 1. In response, Applicant has amended claim 1 to describe the "display state variable" of claim 1 – the structural element corresponding to a display state dimension – more fully, including that a display state variable may be common to at least two display state definitions, each of the at least two display state definitions being associated with a different one of a number of discrete nonequal values of the common display state variable. As Applicant's attorney explained, the

sharing of a display state variable establishes a logical interrelation between the at least two display state definitions (each display state definition including multiple display cell definitions), and because they are associated with different, discrete unequal state values, only contents of one of the at least two logically interrelated display state definitions may be rendered at a time. The comments below point out in greater detail the arguments Applicant's attorney made to the Examiner.

Claim Rejections – 35 U.S.C. § 102

In "Claim Rejections – 35 USC § 102" on page 3 of the above-identified Office Action, claims 1, 3, 4, 6, 10, 11, 15, 20, 21, 25, 26, 30, 35, 36, 40, 41, 45, 47-49, and 51-53 have been rejected as being fully anticipated by U.S. Patent No. 6,178,432 to *Cook et al.* (hereinafter "Cook") under 35 U.S.C. § 102(e).

The rejections of claims 10, 25, 26, and 40 are obviated by their cancellations.

Claim 1 has been amended to recite a method comprising:

"receiving by a client device, from a remote server, a plurality of display state definitions
defining a plurality of instantiations of a user interface of an application for a
plurality of display states of the user interface, wherein (1) at least one of the
plurality of instantiations of the user interface corresponds to a multidimensional
display state, the at least one instantiation defined by two or more of the plurality
of display state definitions, and (2) at least two of the plurality of display state
definitions including pluralities of display cell definitions correspondingly
defining pluralities of display cells of at least one of the plurality of instantiations
of the user interface, the at least two display state definitions being associated
with a display state variable of a first of a plurality of display state dimensions,
the display state variable being common to both, and each of the at least two
display state definitions being associated with a different one of a plurality of
discrete unequal display state values of the common display state variable, at least
one display cell definition of one of the pluralities of display cell definitions
having a transition rule that sets the common display state variable in response to

user interaction with the display cell specified by the at least one display cell definition, said setting to facilitate determining by the client device a display state of the user interface;

examining locally by the client device, one or more display state variables of the- display state dimensions to determine a current display state of the user interface; and

provisioning by the client device, a current instantiation of said user interface in accordance with one or more of the display state definitions associated with the determined current display state."

In contrast, Cook does not disclose, expressly or inherently, a display state variable that is common to both of at least two display state definitions. As the Examiner has pointed out, Cook does disclose display objects, each of which may have a state, such as hidden or shown. The display object state may be represented by a tag, which may have either a hidden or shown state as its value. These objects, as illustrated by Figures 3A and 3B of Cook may be organized into groups of related objects, such as the "Groups" of Figure 3B. In rejecting Applicant's claims, the Examiner has equated the object definitions to the display cell definitions recited by claim 1, has equated the tags to the display state variable of claim 1, and has equated the "Groups" to the display state definitions of claim 1.

Even assuming that the Examiner is correct in equating "Groups" to display state definitions and display objects to display cell definitions, the display object tags of Cook simply cannot read on "a display state variable that is common to both" of "at least two display state definitions". As is now recited, the display state variable is common to two display state definitions, which the Examiner equates to the "Groups" of Cook. The "Groups" in Cook, however, have no variable or tag associated with them. Rather, only individual objects have variables/tags in Cook, and none of these variables/tags bare any sort of relation to variables/tags of other objects. As amended, claim requires not only that two of the display definitions (Groups) be associated with a variable/tag, but also that the variable be common to both. For Example, in the originally filed Specification, on pages 14-15, a number of display state definitions are associated with display state variable, "S", that is common to those display state definitions. Further, amended claim 1 recites that each of the two display state definitions

associated with the common display state variable also be associated with "a different one of a plurality of discrete unequal display state values of the common display state variable". Returning to the example found on pages 14-15, multiple definitions can be found with discrete nonequal values, such as "1" and "2". The advantage of the common variable with multiple, differing values is to logically interrelate groups of visible objects such that only contents of one of the interrelated groups is rendered at a time. Cook lacks any sort of logical interrelation between the "Groups" illustrated in Figures 3A-3B and described throughout. Thus, Cook provides no suggestion for including such a common display state variable.

In addition to failing to disclose a display state variable that is common to at least tow display state definitions, Cook also fails to disclose a transition rule of a display cell definition that sets "the common display state variable". In the above-identified Office Action, the Examiner equates the transition rule of claim 1 to the behaviors taught by Cook. In Cook, an object may be associated with a behavior, and when a user interacts with the object, a state of a target object may be changed (from "hidden" to "shown", for example). Applicant respectfully disagrees with the Examiner, however, as the behaviors of Cook only set the state of a target object, not "the common display state variable", which is recited as being common to at least two display state definitions that each has a plurality of display cell definitions. By setting the display state variable, the method of claim 1 affects the visibility of an entire group of objects - those object (display cells) specified by display cell definitions of a display state definition associated with the value to which the display state variable is set by the rule. Thus, while Cook disclose a transition rule of sorts, a rule capable of setting a variable (tag, in Cook's parlance) associated with an object, Cook fails, for example, to teach a behavior that sets the state of a group, such as one of the "Groups" of Figure 3B, because in Cook only the objects have states that may be set.

Accordingly, amended claim 1 is patentable over Cook under 35 USC §102(e).

Each of independent, amended claims 11, 15, 30, and 41 includes in substance the same recitations of amended claim 1 discussed above. Thus, for at least the same reasons, independent claims 11, 15, 30, and 41 are patentable over Cook.

Claims 3, 4, 6, 20, 21, 35, 36, 45, 47-49, and 51-53 depend on claims 1, 11, 15, 30, or 41, incorporating their limitations, respectively. Accordingly, for at least the same reasons, claims 3, 4, 6, 20, 21, 35, 36, 45, 47-49, and 51-53 are patentable over Cook.

Claim Rejections – 35 U.S.C. § 103

In "Claim Rejections – 35 USC § 103" on page 13 of the above-identified Office Action, claims 5, 12, 19, 27, 34, and 42 have been rejected as being unpatentable over Cook and U.S. Patent No. 6,222,537 to *Smith et al.* (hereinafter "Smith") under 35 U.S.C. § 103(a).

The rejection of claim 27 is obviated by the cancellation of that claim.

Smith fails to cure the above discussed deficiencies of Cook. Therefore, amended claims 1, 11, 15, 30, and 41 remain patentable over Cook, even when combined with Smith.

Claims 5, 12, 19, 34, and 42 depend from claims 1, 11, 15, 30, and 41, respectively, incorporating their limitations. Accordingly, claims 5, 12, 19, 34, and 42 are patentable over Cook and Smith, alone or in combination, under §103(a).

<u>Conclusion</u>

In conclusion, Applicant respectfully submits that remaining claims 1, 3-6, 11, 12, 15, 19-21, 30, 34-36, 41, 42, 45, 47-49, and 51-53 are in condition for allowance. Early issuance of a Notice of Allowance is respectfully requested. If the Examiner has any questions concerning the present paper, the Examiner is kindly requested to contact the undersigned at (206) 407-1513. If any fees are due in connection with filing this paper, the Commissioner is authorized to charge the Deposit Account of Schwabe, Williamson and Wyatt, P.C., No. 50-0393.

Respectfully submitted,
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